

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

VALENTIN HERNANDEZ,
Plaintiff

§
§
§
§
§

v.

CIVIL NO. 3:15-cv-04016-L

**SAFECO INSURANCE COMPANY
OF INDIANA**
Defendant

§
§
§
§

JOINT MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Plaintiff Valentin Hernandez (“Plaintiff”) and Defendant Safeco Insurance Company of Indiana (“Defendant”) and file this Joint Motion to Dismiss with Prejudice, and for cause would show the Court the following:

I.

Plaintiff and Defendant request that Plaintiff’s claims against Defendant in this lawsuit be dismissed because the parties have compromised and settled their differences.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Valentin Hernandez and Defendant Safeco Insurance Company of Indiana request that Plaintiff’s claims against Defendant in the above-referenced cause be dismissed with prejudice to refile same, that all costs be assessed against the party incurring same, and for all other relief to which the parties have shown themselves justly entitled.

Respectfully submitted,

HANNA & PLAUT, L.L.P.
211 East Seventh Street, Suite 600
Austin, Texas 78701
Telephone: (512) 472-7700
Facsimile: (512) 472-0205

By: /s/ Catherine L. Hanna

Catherine L. Hanna
State Bar No. 08918280
Email: channa@hannaplaut.com
Sheila S. Tan
State Bar No. 24078047
Email: stan@hannaplaut.com

**ATTORNEYS FOR DEFENDANT
SAFECO INSURANCE COMPANY OF
INDIANA**

AND

THE FITTS LAW FIRM, PLLC
2700 Post Oak Boulevard, Suite 1120
Houston, Texas 77056
Telephone: (713) 871-1670
Facsimile: (713) 583-1492

By: /s/ Carla R. Delpit

Bryan A. Fitts
State Bar No. 24040904
Email: bfitts@fittslawfirm.com
Carla R. Delpit
State Bar No. 24082183
Email: cdelpit@fittslawfirm.com

**ATTORNEYS FOR PLAINTIFF
VALENTIN HERNANDEZ**

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2017, a true and correct copy of this document was filed via the Court's ECF system pursuant to LR5.1. The notice of electronic filing generated by the ECF system constitutes service of the document on counsel who are registered users of the system. Any other counsel of record will be served pursuant to FRCP 5(b) on this same date.

Bryan A. Fitts
Carla R. Delpit
The Fitts Law Firm, PLLC
2700 Post Oak Boulevard, Suite 1120
Houston, Texas 77056
Telephone: (713) 871-1670
Facsimile: (713) 583-1492
Attorneys for Plaintiff

/s/ Catherine L. Hanna
Catherine L. Hanna